

Exhibit A

Michael Gibaldi

From: SG <steve@batterypark.tv>
Sent: Wednesday, April 12, 2017 7:36 PM
To: Michael Gasi, Esq.
Cc: Michael Tremonte; Michael Gibaldi; Justin Gunnell; Riegel Deborah; Isaac D. Tilton
Subject: Notice of written deposition of Linda Soriero
Attachments: 2017 4-12-2017 Notice of Written Deposition to Linda Soriero.pdf

Steven Greer
(212) 945-7252

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEVEN E. GREER, MD

}

Plaintiff;

}

v.

}

**Dennis Mehiel, Robert Serpico, The Battery
Park City Authority, Howard Milstein,
Steven Rossi, Janet Martin, Milford
Management, Mariners Cove Site B
Associates**

}

Defendants.

}

)

CIVIL ACTION NO.

15-CV-6119 (AJN)(JLC)

**NOTICE OF
WRITTEN DEPOSITION
OF LINDA SORIERO**

Steven Greer, pro se
4674 Tattersall Court
Columbus, Ohio 43230
(212) 945-7252
steve@batterypark.tv

PLEASE TAKE NOTICE that, pursuant to Rule 31 of the Federal Rules of Civil Procedure, Steven Greer will take the written deposition of Linda Soriero on **April 12, 2017**. The questions are attached, below. The written answers should be returned by April 14, 2017, which is the deadline for all discovery set by the judge. The defendants in this case will have an opportunity to serve Ms. Soriero with cross-questions at her address of 1762 West 11th Street, Brooklyn, NY 11223-1142

Dated: April 12th, 2017
New York, NY

/s/ Steven Greer, *pro se*
4674 Tattersall Court
Columbus, Ohio 43230
(212) 945-7252

1. How long did you work for the BPCA?
2. What was your job role?
3. Did you have access to Mr. Serpico's office and computer?
4. Were you recently fired by the BPCA? Why?
5. Do you know of others in the BPCA also fired for no good reason?
6. Do you know who Steven Greer is? If so, when did you first learn of him?
7. Is Steven Greer respected in his community of Battery Park City and Lower Manhattan?
8. What makes you believe that?
9. Do you know that Steven Greer runs the online news site BatteryPark.TV?
10. Do you think that the BatteryPark.TV news site is well respected as a source of truthful undercover reporting on the BPCA?
11. Within the BPCA offices, do many people follow the stories on BatteryPark.TV?
12. Are BatteryPark.TV stories the topic of discussion often?
13. Please recall for me every instance in which either Steven Greer or his articles were discussed internally at BPCA.
14. Did Robert Serpico follow BatteryPark.TV?
15. Did any of BatteryPark.TV stories upset Serpico?
16. Did any of Steven Greer's stories upset Mr. Serpico's wife enough to have them consider suing him?
17. Did Chairman/CEO Dennis Mehiel draft a letter to Steven Greer threatening Greer to stop hurting the reputation of the BPCA?
18. Who is Steve Rossi?
19. How often would you see Serpico and Rossi meeting over coffee or on some other informal location?
20. Did you ever see or hear BPCA employees and anyone from the Milstein/Milford companies meet to discuss any issue? What issues?
21. Did you ever hear or see the topic of Steven Greer's apartment lease come up in any context? Please describe.

22. Do you believe that Mr. Serpico retaliated against Steven Greer for his reporting of scandals related to Mr. Serpico?
23. How did Serpico retaliate?
24. Why did Serpico retaliate against Greer? Was it because of the scandals uncovered in BP.TV, such as Serpico's history of alleged sexual harassment?
25. Did you see Serpico meet with Rossi in late 2013 or January of 2014 while Serpico was the acting president of the BPCA?
26. Did you see any emails between the Rossi and Serpico discussing Greer or his apartment?
27. Who else at the BPCA might have helped Serpico to retaliate against Greer?